

FILED

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

2013 AUG 22 P 3:04

SAMANTHA HEDGSPETH

: CLERK US DISTRICT COURT
Plaintiff, : ALEXANDRIA, VIRGINIA

v.

: Case No. 1:13cv1054
BEACON CAPITAL PARTNERS, LLC, et al. : CMH/TCB

Defendants.

:

PETITION FOR REMOVAL

COMES NOW Defendant, Brandywine Realty Trust (hereinafter "Defendant Brandywine") by and through its attorneys, Bonner Kiernan Trebach & Crociata, LLP, with the consent of Defendants Beacon Capital Partners, LLC (hereinafter "Defendant Beacon") and Jones Lang Lasalle (hereinafter "Defendant Jones Lang"), and states as follows:

1. Petitioner is a defendant in the captioned litigation.

2. This action was instituted by Plaintiff, Samantha Hedgspeth, against the Defendants by the filing of a Complaint on the 26th day of June, 2013, and the action is now pending in the Circuit Court of Virginia for the County of Fairfax, At Law Number CL-2013-0010667. Defendant Brandywine Realty Trust was served with the Complaint on the 23rd day of July, 2013.

3. Plaintiff is a resident and permanent citizen of the Commonwealth of Virginia.

See Complaint ¶ 1.

4. At the time of the commencement of the action, Defendant Brandywine Realty Trust was and is a real estate investment trust organized and incorporated under the laws of the

State of Maryland, with its principal place of business located in the Commonwealth of Pennsylvania.

5. At the time of the commencement of the action, Defendant Jones Lang Lasalle was and is a corporation organized and incorporated under the laws of the State of Illinois, with its principal place of business located in Chicago, Illinois.

6. At the time of the commencement of the action, Defendant Beacon Capital Partners, LLC was and is a limited liability company organized and incorporated under the laws of the State of Delaware, with its principal place of business located in Boston, Massachusetts. None of Defendant Beacon's members are permanent citizens or residents of the Commonwealth of Virginia.

7. The amount sued for by Plaintiff is in excess of seventy-five thousand dollars USD (\$75,000.00). *See Complaint*, attached hereto as Exhibit 1.

8. This civil action involves a dispute between parties of diverse jurisdictions and is subject to the original jurisdiction of the District Court of the United States pursuant to 28 U.S.C. §§ 1332 and 1441.

8. Petitioner files herewith the Complaint filed by Plaintiffs as part of this Petition.

9. Petitioner files herewith the Answers filed by Defendants as part of this Petition.

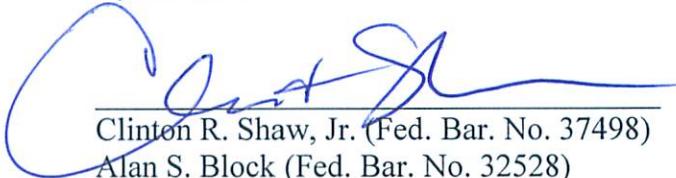
10. No admission of fact, law or liability is intended by this Notice of Removal, and all defenses, affirmative defenses and motions is hereby reserved to Defendants.

WHEREFORE, Petitioner prays this case be removed to the United States District Court for the Eastern District of Virginia, Alexandria Division.

Dated: August 22, 2013

Respectfully submitted,

Brandywine Realty Trust
By Counsel



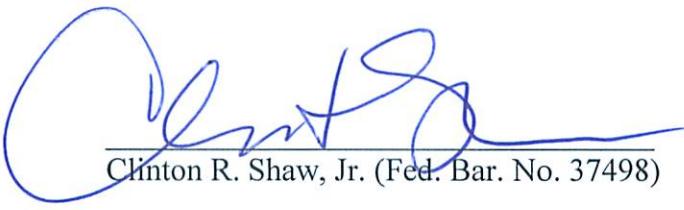
Clinton R. Shaw, Jr. (Fed. Bar. No. 37498)
Alan S. Block (Fed. Bar. No. 32528)

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Counsel for Defendant Brandywine Realty Trust

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing Petition for Removal, this 22nd day of August, 2013, to be served, via first class mail, postage prepaid, on:

Nicholas H. Hantzes, Esq.
Jessica P. Bunce, Esq.
Hantzes & Associates
1749 Old Meadow Road
Suite 308
McLean, VA 22102



Clinton R. Shaw, Jr. (Fed. Bar. No. 37498)